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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

WAYMO LLC,  
Plaintiff,  
v.  
UBER TECHNOLOGIES, INC.,  
OTTOMOTTO LLC; OTTO TRUCKING LLC,  
Defendant.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF  
ESTHER KIM CHANG IN SUPPORT  
OF DEFENDANTS UBER  
TECHNOLOGIES, INC. AND  
OTTOMOTTO, LLC'S  
SUPPLEMENTAL BRIEF IN  
SUPPORT OF MOTION TO STRIKE  
VAGUE AND OVERBROAD TRADE  
SECRET CLAIMS**

Judge: The Honorable William Alsup

Trial Date: October 10, 2017

I, Esther Kim Chang, declare as follows:

1. I am an attorney with the law firm of Morrison & Foerster LLP. I am a member in good standing of the Bar of the State of California. I make this declaration based on personal knowledge and, if called as a witness, I could and would testify competently to the matters set forth herein. I make this declaration in support of Defendants Uber Technologies, Inc. and Ottomotto LLC's Supplemental Brief in Support of Motion to Strike Vague and Overbroad Trade Secret Claims.

2. Attached as **Exhibit 1** are true and correct excerpts of the August 24, 2017  
Opening Expert Report of Lambertus Hesselink, Ph.D.

3. Attached as **Exhibit 2** are true and correct excerpts of the April 26, 2017 deposition of Gregory Kintz.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 28th day of August, 2017, in San Francisco, California.

/s/ Esther Kim Chang

ESTHER KIM CHANG

## ATTESTATION OF E-FILED SIGNATURE

I, Arturo J. González, am the ECF User whose ID and password are being used to file this Declaration. In compliance with General Order 45, X.B., I hereby attest that Esther Kim Chang has concurred in this filing.

Dated: August 28, 2017

/s/ Arturo J. González

ARTURO J. GONZÁLEZ